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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO
MOTION TO STAY JUDGMENT, PENDING AN APPEAL OF MY MOTION FOR
LEAVE TO INTERVENE**

No. 3:12-cv-2039

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2. To prevail upon a motion to amend judgment is very difficult; the general rule in the 1st Circuit is that the moving party must "either clearly establish a manifest error of law or must present newly discovered evidence." Pomerleau v. W. Springfield Pub. Sch., 362 F.3d 143, 146 n.2 (1st Cir. 2004) (quoting FDIC v. World Univ. Inc., 978 F.2d 10, 16 (1st Cir. 1992)). Grants and denials of FRCP 59(e) motions are reviewed only for abuse of discretion. See Venegas-Hernandez v. Sonolux Records, 370 F.3d 183, 190 (1st Cir. 2004).

3. Proposed Intervening Defendant believes that the Judgment in the instant case presents both manifest errors of law and of facts, which result in a manifest injustice to me, personally; and to PRPD police officers and other potential co-Defendants, per the doctrine of *Jus Tertii*, as applies in the instant case.

4. This "Motion to Amend Judgment" is based on the accompanying "Memorandum of Law" in support thereof.

WHEREFORE, proposed Intervening Defendant Jorge Díaz Castro, as a concerned lobbyist for Defendant PRPD, respectfully requests that this motion be granted in the instant case; that the Court's Order and Judgment of July 17th and July 18th, 2013, respectively, be vacated; and that the case re-opened, pending an appeal of the denial of my "Notice of Motion and Motion for Leave to Intervene."

Continued...

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CERTIFICATION: I hereby certify that today I filed the foregoing with the Clerk of the Court which, on information and belief, shall automatically notify counsel of record which are CM/ECF system participants at the corresponding e-mail address, and which pursuant to Local Civil Rule 5, constitutes the equivalent service.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on this 15th day of August, 2013.



Jorge Díaz Castro

PRO SE

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